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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

MAXIMILIAN KLEIN, et al.,  
  
Plaintiffs,  
  
v.  
  
META PLATFORMS, INC.,  
  
Defendant.

Case No. 3:20-cv-08570-JD

Hon. James Donato

**DECLARATION OF BRIAN J. DUNNE  
IN SUPPORT OF ADVERTISER  
PLAINTIFFS' MOTION TO EXCLUDE  
OPINION TESTIMONY OF DR.  
GEORGIOS ZERVAS**

1 I, Brian J. Dunne, declare and state as follows:

2 1. I am an attorney licensed in the State of California and admitted to the United States  
3 District Court for the Northern District of California. I am a partner at Bathaee Dunne LLP, counsel for  
4 the Advertiser Plaintiffs in the above-captioned matter. I have personal knowledge of the facts set forth  
5 herein and, if called as a witness, could and would testify competently to them.

6 2. This declaration is made in support of Advertiser Plaintiffs' Motion to Exclude Opinion  
7 Testimony of Dr. Georgios Zervas.

8 3. Attached as **Exhibit 1** is a true and correct copy of the Expert Merits Report of Markus  
9 Jakobsson, Ph.D., dated January 12, 2024.

10 4. Attached as **Exhibit 2** is a true and correct copy of the Expert Merits Report of Tilman  
11 Klumpp, Ph.D., dated January 12, 2024.

12 5. Attached as **Exhibit 3** is a true and correct copy of the Expert Merits Rebuttal Report of  
13 Markus Jakobsson, Ph.D., dated February 9, 2024.

14 6. Attached as **Exhibit 4** is a true and correct copy of the Expert Merits Report of Tilman  
15 Klumpp, Ph.D., dated February 9, 2024.

16 7. Attached as **Exhibit 5** is a true and correct copy of a document produced by Meta in this  
17 litigation, which was marked as PX 2255 at the deposition of Mark Zuckerberg.

18 8. Attached as **Exhibit 6** is a true and correct copy of a document produced by Meta in this  
19 litigation, which was marked as PX 414 at the deposition of Javier Olivan.

20 9. Attached as **Exhibit 7** is a true and correct copy of a document produced by Meta in this  
21 litigation, which was marked as PX 2256 at the deposition of Mark Zuckerberg.

22 10. Attached as **Exhibit 8** is a true and correct copy of the Advertiser Merits Rebuttal Report  
23 of Georgios Zervas, Ph.D., dated February 9, 2024.

24 11. Attached as **Exhibit 9** is a true and correct copy of excerpts from the certified transcript  
25 of the March 19, 2024 deposition of Georgios Zervas.

26 12. Attached as **Exhibit 10** is a true and correct copy of a document produced by Meta in  
27 this litigation, which was marked as PX 26 at the deposition of Keval Patel.

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